

I am a licensed Private Pilot and use a Twin Engine Piper Seneca V, a PA34-220T
I actually monitor 121.5 whenever I fly to help identify any aircraft in distress.

I find that the proceedings by the FCC do not take into consideration the changing dynamics of private aviation and will decrease the margin of safety, rather than increasing it with the use of 406 ELT's

The dynamics are as follows

- 1) A conversion to a 406 ELT would cost approximately \$1000.00
- 2) No study has been done to prove that plane based 406 ELT's are more likely to operate after an accident.
- 3) Current technology on 406ELT's does not take into consideration the early adoption of the FAA's mandated adsb-out. (My airplane already has a Garmin product that will provide ADSB-out)
- 4) ADSB-out will provide the FAA exact location of last track for aircraft. It's an active system and provides immediate feedback.
- 5) Many pilots have purchased personal EPRIB's in the 406 Mhz. they bring these from aircraft to aircraft. Pushing for aircraft based eprib's would reduce the adoption of the epribs, which coincidentally are cheaper than the ELT's. Often when flying with other pilots, we end up with more than one EPRIB in the plane. This is actually safer!! So why force pilots to buy an expensive plane based device which will not add to safety?

Finally, I don't understand the FCC regulating Aviation, is that not the function of the FAA?